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June 29, 2011

VIA ECF FILING

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

*In re Application of Debbie Gushlak for an Order Pursuant to 28 U.S.C. §1782  
MC-11-218(NGG)*

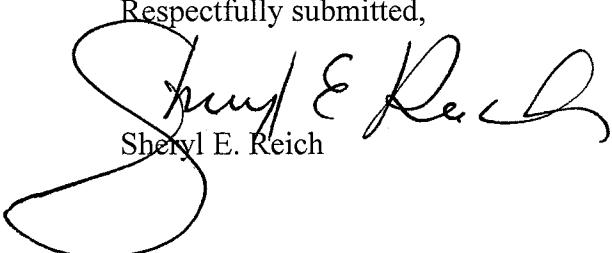
Dear Judge Garaufis:

We write as counsel to Applicant Debbie Gushlak to object to the request made by Alan Futerfas as counsel to putative witness Yelena Furman to allow that the objections to the issuance of a subpoena pursuant to 28 U.S.C. §1782 be filed under seal. The request was made in an unfiled letter to the Court dated June 27, 2011.

Fed.R.Civ.P. 5.2(a) provides a procedure for the redaction of confidential material without either imposing significant restrictions on the parties occasioned by sealing or depriving the public of its right to know what goes on in judicial proceedings. Nothing in the documents warrants special treatment.

Thank you for your attention to this matter. Per the Court's rule with respect to non-time sensitive documents of fewer than five pages, no courtesy copy is being provided to Chambers.

Respectfully submitted,

  
Sheryl E. Reich